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UNITED STATES OF AMERICA
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13 UNITED STATES DISTRICT COURT

14 FOR THE CENTRAL DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,

No. CR 2:24-CR-00570-WLH

16 Plaintiff,

STATUS REPORT RE: UNINDICTED CO-
CONSPIRATOR #1 AND DEFENDANT
SAFETY CONCERNS

17 v.

18 CLAIRE PATRICIA HAVILAND, et
al.,

19 Defendants.
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23 Plaintiff United States of America, by and through its counsel
24 of record, the United States Attorney for the Central District of
25 California and Assistant United States Attorneys Reema M. El-Amamy
26 and Bruce K. Riordan, provides the following update to the Court
27 regarding unindicted co-conspirator #1 and safety concerns related
28 to various defendants and unindicted co-conspirators.

1 On or about May 21, 2025, unindicted co-conspirator #1 was
2 murdered while in state custody.¹ Government counsel learned about
3 the murder of unindicted co-conspirator #1 through a press release
4 published the day after his murder. Unindicted co-conspirator #1
5 was a high-ranking Aryan Brotherhood ("AB") associate. The
6 government has received credible information from one or more
7 sources that unindicted co-conspirator #2 exercised a leadership
8 role with respect to the greenlight on unindicted co-conspirator #1.
9 Unindicted co-conspirator #2 is an AB member who is currently in
10 custody. This credible information has yet to be verified
11 independently by the government.

12 The government provides this report to the Court to document
13 its efforts following the murder of unindicted co-conspirator #1.

- 14 1. The government recently learned of a greenlight on
15 unindicted co-conspirator #40 related to the greenlight on
16 unindicted co-conspirator #1. The government made
17 appropriate notifications to the Federal Bureau of Prisons
18 ("BOP") so that safety measures could be taken with respect
19 to unindicted co-conspirator #40.
- 20 2. The government learned about potential threats of violence
21 towards one or more defendants in this matter. When any non-
22 speculative threats are received by the government, they are
23 promptly communicated to counsel for that particular
24 defendant. If any attorney has not received specific
25 information regarding a threat to his/her client, it means

27 ¹ See <https://www.cdcr.ca.gov/news/2025/05/21/kern-valley-state->
28 <prison-officials-investigating-the-death-of-an-incarcerated-person-as-a-homicide-9/>.

1 that the government has not received non-speculative
2 information regarding any threat of violence as to that
3 defendant.

4 3. Understandably, many defendants and their counsel have been
5 very disturbed after the murder of unindicted co-conspirator
6 #1 and any implications as to the safety concerns. The
7 government has been responding to numerous individual
8 requests for telephone calls from counsel in this matter.
9 Initially, this was handled by undersigned government
10 counsel. However, given the volume of calls and the urgency
11 regarding various questions, the government issued cellular
12 telephone number of the primary case agent in this matter was
13 circulated to counsel for defendants as a primary starting
14 point for discussions regarding any safety concerns in this
15 matter. Law enforcement resources will be expended as
16 necessary to ameliorate any safety concern.

17 4. The government has communicated with BOP at the Metropolitan
18 Detention Center ("MDC") as appropriate regarding safety
19 concerns, including considering the murder of unindicted co-
20 conspirator #1. The government has also alerted BOP MDC of
21 likely possession and use of drugs by one or more defendants
22 in custody so that BOP MDC may independently evaluate any in
23 custody disciplinary actions towards defendants in this
24 matter who use or possess drugs. Drug use while discussing
25 acts of violence with others is a dangerous combination in
26 these circumstances, and the government will continue to make
27 disclosures regarding disciplinary infractions to MDC.

1 5. The government is in the process of obtaining communications
2 made, to date, by custodial inmates, including those made
3 through covert and/or unsanctioned means. This includes
4 using another inmate's assigned telephone identification
5 number. This is a very time-consuming process and will take
6 several weeks.

7 6. The government continues to communicate with the California
8 Department of Corrections and Rehabilitation as needed.

9 7. The government has shared with **all defense counsel** any
10 credible threat of violence it receives that it believes to
11 be appropriate to share with all defense counsel, so that
12 defense counsel may communicate amongst themselves the safety
13 of defendants in this matter. The government makes such
14 group disclosures **only when** nothing in a group disclosure
15 will harm one or more defendant.

16 The government provides this status report to the Court for
17 transparency regarding its actions regarding safety issues and to
18 have a clear record regarding what steps it takes. Moreover, it is
19 important to the government to inform the Court of the serious

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1 nature of any safety concerns for the majority of defendants,
2 particularly, if, in the future, the government requests additional
3 measures related to safety.

4 RESPECTFULLY SUBMITTED,

5 DATED: June 1, 2025

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9 /s/ Reema M. El-Amamy
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12 Attorneys for Plaintiff
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